

UNITED STATES DISTRICT COURT IN THE EASTERN DISTRICT OF OKLAHOMA

BRANDON LEE BROWN #592090,  
PLAINTIFF,

V.

JAMES VATES, et al.  
DEFENDANTS.

CASE NO. CIV-24-RAW-SPS  
20c-124

**FILED**

APR - 6 2021

PATRICK KEANEY  
Clerk, U.S. District Court

By \_\_\_\_\_  
Deputy Clerk

OPPOSITION

1. THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO REDRESS THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE COURT HAS JURISDICTION UNDER FED. R. CIV. P. 56 (c).

II. PLAINTIFFS

2. PLAINTIFF, BRANDON LEE BROWN #592090, IS AND WAS AT ALL TIMES MENTIONED HERE IN A PRISONER OF THE STATE OF OKLAHOMA IN THE CUSTODY OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS. HE IS CONFINED IN DAVIS CORRECTIONAL FACILITY, IN HOLDENVILLE, OKLAHOMA.



### III. DEFENDANTS

4. DEFENDANT, JOE M. ALBAUGH, IS THE DIRECTOR / COMMISSIONER OF THE STATE OF OKLAHOMA DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE OVERALL OPERATION OF THE DEPARTMENT AND EACH INSTITUTION UNDER ITS JURISDICTION, INCLUDING DAVIS CORRECTIONAL FACILITY.

5. DEFENDANT, MACK KNUTSON IS A DIRECTOR / DESIGNEE OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF DIRECTOR / DESIGNEE AND ASSIGNED TO THE OKLAHOMA DEPARTMENT OF CORRECTIONS.

6. DEFENDANT, JAMES YATES IS THE SUPERINTENDENT / WARDEN OF DAVIS CORRECTIONAL FACILITY. HE IS LEGALLY RESPONSIBLE FOR THE OPERATION OF DAVIS CORRECTIONAL FACILITY.

7. DEFENDANT JC CULBERT IS A CONTRACT MONITOR OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CONTRACT MONITOR AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

8. DEFENDANT, (AW) MARK LENTZ IS A ASSISTANT / WARDEN OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CONTRACT MONITOR AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.



9. DEFENDANT, PEREZ, IS A DEPUTY WARDEN OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF ASSISTANT DEPUTY/WARDEN AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

10. DEFENDANT, CHEIF BROWN, IS CHIEF OF SECURITY OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CHIEF OF SECURITY AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

11. DEFENDANT, VANCE IS A ASSISTANT/CORRECTIONAL OFFICER OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF ASSISTANT/CORRECTIONAL OFFICER AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

12. DEFENDANT, PATTERSON IS A LAW LIBRARY SUPERVISOR OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF LAW LIBRARY SUPERVISOR AND ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

13. DEFENDANT, LOUTHAN, IS A CORRECTIONAL/OFFICER OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CORRECTIONAL/OFFICER AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

14. DEFENDANT, KEVES IS A DISCIPLINARY HEARING OFFICER OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CORRECTIONAL/OFFICER AND WAS



ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

15. DEFENDANT SHIVLEY NURSE IS A NURSE OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF NURSE AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

16. DEFENDANT BAILEY IS A TRUSTFUND WORKER OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF TRUSTFUND WORKER AND WAS ASSIGNED TO CORRECTIONAL FACILITY.

17. DEFENDANT, CAPTAIN LYSINGER IS A CAPTAIN OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CAPTAIN AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

18. DEFENDANT, MOVETS IS A SUPERVISOR OF THE OKLAHOMA DEPARTMENT OF CORRECTION WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CAPTAIN AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.

19. DEFENDANT DOORMAN IS A ASSISTANT CHIEF OF SECURITY OF THE OKLAHOMA DEPARTMENT OF CORRECTIONS WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF CHIEF AND WAS ASSIGNED TO DAVIS CORRECTIONAL FACILITY.



EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS [OR HER] OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT EACH DEFENDANT ACTED UNDER COLOR OF STATE LAW.

#### IV. FACTS

##### RESPONSE TO MARK KNUTSON AFFIDAVIT

##### ATTACHMENT #10

20. I, PLAINTIFF, BRANDON LEE BROWN #592090 BETWEEN DECEMBER OF 2019 AND SEPTEMBER 2020 DID FILE GRIEVANCES ON ANY CORRESPONDENCE, GRIEVANCES OR GRIEVANCE APPEALS REGARDING DENIAL OF ACCESS TO THE GRIEVANCE PROCESS, THE FAILURE OF THE ACA AND ODOC CONTRACT MONITOR TO ADEQUATELY MONITOR AND ENFORCE ODOC POLICIES AT THE DAVIS CORRECTIONAL FACILITY (DCF) AND ODOC OFFICIALS ENACTING POLICIES THAT ARE USED AS A WEAPON AGAINST INMATES) BROWN #592090 DUNCAN V. OKLAHOMA DEPT. OF CORRECTIONS S.C.

21. BETWEEN 1-8-20 AND 4-3-20 INMATE BROWN SUBMITTED THE FOLLOWING REQUEST TO STATE TO ACA: ACA 20-004 REQUESTING A EXPLANATION REGARDING ALLEGED ABUSE OF THE GRIEVANCE PROCEDURE SEE EXHIBIT "T". ACA REFERRED HIM BACK TO DCF FOR A EXPLANATION. IF IM ASKING HOW IS THE CORRECT WAY TO FILE GRIEVANCE AND IS NOT GIVEN A STRAIGHT ANSWER FROM THE ACA WHICH THE PROCESS GOES NO FURTHER. HOW CAN I THEN BE RESPONSIBLE IF IM TELLING THEM IM IN SPECULATION AT NO FAULT OF MY OWN.



22. BETWEEN 1-8-20 AND 4-3-20 AS EVIDENCE SHOWN IN ATTACHMENT #10; I AT EVERY LEVEL ASKED QUESTION ON HOW TO FILE PROPERLY EACH TIME RETURNED UNANSWERED TO THE PRISON THE FACILITY NOT ALLOWING ME TO DRAW DOWN AS ALLOWED FROM RESPONSE IN ACA 20-105 ASKING THE ACA TO ENFORCE THEIR POLICY AT THE FACILITY SO, THAT I COULD EXHAUST MY REMEDIES THEY DENIED MY REQUEST. THE ONLY OTHER OUTSIDE OF THE YATES ADMINISTRATION TO HAVE SAY IN INCORPORATING CURRENT POLICY IN THE POLICY OF DDOC THAT (DCK) FEEL THEY DIDNT HAVE TO FOLLOW BECAUSE A PRIVATE FACILITY (ALLEGEDLY). P. 9 OF 9 (ALLEGED) I HAD BROKEN LEG AND BROKEN JAW?

23. ACA 20-108 REQUESTING FOR INDIGENT INMATE AND INMATES ON JANTEEN RESTRICTION BE PROVIDED ENVELOPES DESIGNATED FOR LEGAL MAIL - ACA EXPLAINED THE POLICY REGARDING WHAT INMATES ON CANTEEN RESTRICTION AND INDIGENT INMATES HAVE ACCESS TO REGARDING MAIL. THEY (DCK) NEVER ALLOWED ME ACCESS TO MONEY ON MY BOOKS TO RECEIVE SOME ALLOWANCES TO TRY AND CORRECT THE STEPS THAT SHOULD BE FOLLOWED. HOW IS THAT MY FAULT?

24. OP-036461 Pg. 7

LITIGATION RESPONSIBILITIES - A PRIVATE PRISON OPERATOR HOWSOEVER FEDERAL INMATES OR INMATES OF ANOTHER STATE WILL BE RESPONSIBILITY FOR THE REIMBURSEMENT OF ALL REASONABLE COSTS AND EXPENSES INCURRED BY THIS STATE OR A POLITICAL SUBDIVISION OF THIS STATE FOR LEGAL ACTIONS BROUGHT IN THIS STATE BY OR ON BEHALF OF ANY FEDERAL INMATE OR INMATE OF ANOTHER STATE WHILE INCARCERATED IN THE FACILITY.



25. RESPONSE TO SPECIAL REPORT EXHIBIT #1 Pg 3 of 6  
 1 (ALLEGED) DEFAMATION OF CHARACTER I HAVE NEVER BEEN CHARGED FOR OK 21-901.T - ROBBERY OR ATT. W/DANG. WEAPON (65 Pct)

26. I ALLEGED SEXUAL HARASSMENT AND THEY IGNORED A CHANCE TO RESPOND TO ALLEGATIONS IN AMENDED COMPLAINT. THEY ALSO FABRICATED THE FACT I WAS STILL SITTING STRAPPED TO A CHURNEY WHEN THEY REMOVED MY CLOTHES. THEY FAILED TO STATE A RESPONSE TO THE FACT NO LIA WAS EVER SUBMITTED. FAILED TO STATE A CLAIM AS TO WHY I WAS FORCED TO LOSE MY BLOOD, DENIED MEDICAL TREATMENT, BASIC HYGIENE, MAIL, TOILET PAPER, AND EXTORTION PRACTICES AT THE FACILITY. THEY NEVER DENY IT BECAUSE IT WOULD BE ILLEGAL UNDER OATH OF THE COURTS.

27. RESPONSE TO SPECIAL REPORT EXHIBIT #2 Pg 3 of 6 SPONTANEOUS USE OF FORCE INCIDENT INVOLVING INMATES. WHICH IS NOT A PART OF ~~INMATE~~ POLICY. NO STAFF, NO MEDICAL, AND NO CAMERAS WERE USED.  
 OP. USE OF PHYSICAL FORCE

3) A (1) AN INMATE / OFFENDER REFUSES A DIRECT ORDER FROM STAFF WHEN FAILING TO COMPLY WITH DIRECT ORDER ENDANGERS THE SAFETY OF THEMSELVES OR OTHERS; HE FAILED TO DEFEND THE FACT THAT NO ONE WAS IN DANGER. I TOLD HIM I WOULD PACK MY PROPERTY BEFORE CUFFING UP. AS YOU CAN SEE IN THE EXHIBITS SENT I HAD PROPERTY BOUGHT AND PAID FOR AND IT WAS MISPLACED. SO, I FEEL IT WAS APPROPRIATE TO PACK MY BELONGINGS SO I ~~HA~~ DON'T LOSE THE LITTLE THAT I HAD. I NEVER REFUSED!



28. PRECAUTIONS WILL BE TAKEN TO AVOID OR TO MINIMIZE SUCH AGENTS ONTO NON-INVOLVED PERSONS. MY CELLMATE DID NOTHING WRONG.

29. C.(1) UNDER NO CIRCUMSTANCES WILL THE MANUFACTURERS INSTRUCTIONS FOR USE BE VIOLATED;

30. 7 (2) EXCEPT IN AN EMERGENCY (NOT A PLANNED USE OF FORCE), THE USE OF CHEMICAL AGENTS WILL NOT OCCUR UNTIL MEDICAL STAFF HAS SCREENED THE INMATE(S);

31. ~~III~~. ARRESTS- A) LIMITATIONS: STAFF WHO ARE COMMISSIONED BY THE AGENCY DIRECTOR MAY EXERCISE THE POWER OF ARREST IN THE PERFORMANCE OF AGENCY DUTIES, ALL ARREST WILL BE PERFORMED WITH ~~THE~~ THE MINIMUM AMOUNT OF FORCE NECESSARY TO AFFECT THE ARREST.

32. BY HIS OWN STATEMENT HE WAS NOT REQUIRED TO USE PHYSICAL FORCE / CHEMICAL AGENTS TOWARD ME. CONSIDERING THE 300 LB'S DOOR THAT IS LOCKED AND CONFINES ME TO A CELL I WAS NEVER A THREAT TO MYSELF, MY CELLMATE, OR OTHERS.

33. THE INCIDENT OCCURRED ON 11-22-19 I RECEIVED THE WRITE-UP ON 12-14-19. ACCORDING TO DDOR OPS-060125 TIME FRAMES (C) 4) THE OFFENSE REPORT WILL BE PREPARED AND SUBMITTED TO A SUPERVISOR WITHIN TWENTY-FOUR HOUR (24) FROM WHEN THE VIOLATION IS REPORTED AND DISCOVERED, AN INSPECTOR GENERAL INVESTIGATION IS COMPLETE, OR;



34. 1) THE TIME FRAMES PROVIDED FOR IN THIS SECTION WILL BE FOLLOWED BY STAFF. FAILURE TO COMPLY WITH THE TIME FRAMES INDICATED BELOW WILL RESULT IN DISMISSAL OF THE "DEPARTMENT OF CORRECTION REPORT."

35. UNIT MANAGER MARTINEZ IS THE WHO WROTE THE REPORT DATED 12-4-19 THE INCIDENT OCCURRED ON 11-22-19 WELL BEYOND (24) HOURS. I RECEIVED NO EXTENSION ATTACHED TO "OFFENSE REPORT," AS THE OP REQUIRE IT.

36. RESPONSE TO SPECIAL REPORT EXHIBIT #3. ON 3-25-20 I RECEIVED A SUPPLEMENT REPORT ADVISED FROM DIRECTOR OR DESIGNEE UPON RECEIVING IT, I LEARNED THAT MARK MINERS IS THE OFFICER WHO WROTE THE COMPLAINT IS FOR HIM FALSIFYING DOCUMENTS I FIRST NOTICE FROM READING THE REPORT. THE (3RD) SENTENCE IS FALSE AND INCORRECTLY STATED AND INACCURATE TALKS OF EVENTS THAT OCCURRED 2-13-20. FIRST "HE" STATED "I" TOOK A AGGRESSIVE STANCE; BY DEFINITION (STANCE- AWAY OF STANDING).

37. IN THE SAME SENTENCE SAYS; AND ATTEMPTED TO GET UP FROM THE GROUND; WHICH IS CONTRADICTED FROM THE FIRST STATEMENT OF "AGGRESSIVE STANCE" HOW CAN I BE STANDING IF I AM ON THE GROUND? WHICH IS CONTRADICTED THE NEXT STATEMENT OF; AND CHARGE THE EXTRACTION TEAM.

38. "OKAY" SO, LETS BREAK THAT DOWN. "I" TOOK A AGGRESSIVE STANCE AND ATTEMPTED TO GET UP OFF THE GROUND, HUH THEN



AND CHARGE THE EXTRACTION TEAM. SOUNDS LIKE A ACCUSATION RATHER THAN A FACT.

39. FIRST OF ALL "IF, NEVER GOT OFF THE GROUND, HOW THEN CAN HE SAY; AND CHARGE THE EXTRACTION TEAM?"

40. ON MARCH 16, 2020 I RECEIVED A RESPONSE FROM MARK KNUTSON STATED; ONCE RESTRAINED I ATTEMPTED TO CHARGE THE EXTRACTION TEAM. MARK KNUTSON WROTE THIS STATEMENT OF "ALLEGEDLY" SOME OFFICIAL TOLD HIM AT (DCF), TWO(2) CONTRADICTORY STATEMENTS. ONE "ALLEGING" I DID ATTACK, THE OTHER ALLEGATIONS ALL TOGETHER. VIDEO SURVEILLANCE TELLS ANOTHER STORY.

41. WHAT RECENT BEHAVIOR WAS I DOWNTOWN TO BE PLACED ON CELL RESTRICTION? AN ELEMENT "WHAT" BEHAVIOR?

42. THE VIDEO WILL PROVE I WAS NEVER ASKED TO CUFF UP WHEN MARK WENTZ AND ANASTASIO PEREZ WERE AT THE DOOR 15-20 MIN BEFORE EXTRACTION TEAM CAME BEFORE.

43. MARK KNUTSON 3-18-20 STATED; AT THIS POINT, THIS OFFICE HAS NO IDEA WHAT OCCURRED ON 2-13-20. THIS IS NO LITERICAL ERROR, IT IS, LEGIBLE AND FAUSIFIED! HE ALSO (ALLEGED) 5 "1" (ALLEGED) 6 OFFICERS IN TACTICAL WEAR. (VIEW VIDEO FOOTAGE) HE (ALLEGED) I RESISTED BUT, FIRST SENTENCE SAY I COMPLIED WHEN GIVEN VERBAL ORDERS TO SUBMIT TO HAND RESTRAINTS, HUH???



44. HE ALLEGED ABRASION / SCRATCH. I NOW HAVE A (1) INCH INCISION ABOVE MY LEFT EYE WITH A MINOR CUT ABOVE IT, SCARS STILL VISIBLE.

45. INSIDE MY MOUTH A (2) INCH CUT THAT REVEALED CARTILAGE AND LINGUAL INSIDE SCAR STILL VISIBLE (REDDED UNDER LEFT EYE) NOT LIKELY! MY FACE WAS SO SWOLLEN PLASMA SEEP FROM MY PORES. FOR SUCH ALLEGATIONS MADE IN THIS MANNER STATING MINOR INJURIES SURELY WAS DOCUMENTED (SEE PHOTOS).

46. MARK MUMFORD (ALLEGEDLY) TRIED TO HIDE FACTS AND FABRICATE OTHERS. "ON THE ACTUAL WRITE-UP IT SEEMS THAT HE, 'TYPED IN' 'POSSESSION OF ILLICIT DRUGS' SOMEONE SCRATCHED THAT OUT. I DON'T CLAIM TO BE THE BRIGHTEST PERSON BUT SEEMS LIKE I WAS ABOUT TO GET ACCUSED OF HAVE ILLICIT DRUGS. WHICH AS I, STATED, BEFORE THE ATTORNEY GENERAL'S OFFICE AND DISTRICT ATTORNEY'S OFFICE WANTED TO DEFEND. THEY CLAIM TO NOT UNDERSTAND?"

47. EVIDENCE UP-060125 (PL-14) 1-(2) IF SUCH EVIDENCE IS TOO INCONSPICUOUS TO BE READILY SECURED IT MAY BE PHOTOGRAPHED OR PHOTOCOPIED AND DESCRIBED IN ITS ORIGINAL STATE. SAMPLES AND PHOTOCOPIES WILL ALSO BE ATTACHED TO THE "OFFENSE REPORT." I JUST ON THE 24TH DAY OF MARCH 2020 RECEIVE THE PHOTOS.

48. RESPONSE TO SPECIAL REPORT EXHIBIT #4 NURSE SHIVLEY AND NURSE WOODMAN DENIED ME MEDICAL TREATMENT AT SOME POINT.



49. NURSE SHIVLEY (ALLEGEDLY) DENIED ME ANY MEDICAL AID ON 2-13-20 I WAS BLEEDING FROM MY MOUTH AND EYE AND HAD LACERATIONS BEHIND MY EAR. SHE TOOK MY BLOOD PRESSURE AND DID NOT APPLY ANY OTHER AID. VIEW (CAMERA) IN FOX CLASSROOM AND PICTURES FROM (DCF) ADMINISTRATION. SHE SWORE AND TOOK OATH TO TAKE CARE OF THE SICK, INJURED, AND DYING. SHE DID NOT UPHOLD THAT OATH. SHE SHOWED BIAS IN HER CARE A PATIENT IN NEED OF CARE / AID AND ASSISTANCE.

50. MS. BAILEY TRUST FUND OFFICER (ALLEGEDLY) VIOLATE MY 1ST AMENDMENT RIGHT OF FREEDOM OF SPEECH. I HAD NO MONEY SENT IN SINCE OCTOBER 2019 1/2 HALF OF, THAT WAS TAKEN UPON RECEPTION. DATE OF INCIDENT 12-11-19 MY AVAILABILITY IS \$ IS WHAT SHE STATED BUT, NEVER FORWARD ME ANY PROPER FORM TO USE FUNDS THAT WERE AVAILABLE (SEE ACCOUNT INFO EXHIBITS FOR DETAILS)

51. ALLOWABLE CORRESPONDENCE OP-36117

1) THE VOLUME, LENGTH, LANGUAGE, OR RECIPIENT OF OUTGOING/INCOMING CORRESPONDENCE. WILL NOT BE RESTRICTED UNLESS THERE IS REASONABLE SUSPICION, BELIEF, OR GROUNDS THAT WARRANT LIMITATION TO PROTECT THE PUBLIC, INSTITUTIONAL ORDER, AND SECURITY. UNLESS OTHERWISE OUTLINED IN THIS PROCEDURE. (4-4488)

52. 3) AN OFFENDER ON SEGREGATION HOUSING STATUS WILL HAVE THE SAME CORRESPONDENCE PRIVILEGES AS OFFENDERS IN GENERAL POPULATION. (4-4266)



### 53. E. PROVISIONS OF INDIGENT OFFENDERS SERVICES

1) AN OFFENDER WITHOUT FUNDS WILL BE PROVIDED PAID U.S. POSTAGE FOR NO MORE THAN A TOTAL OF TWO, ONE-ONCE PRIVILEGED OR NON-PRIVILEGED LETTERS PER WEEK (4-44894MRS-6A-06)

54. F. COST ASSOCIATED WITH MAILING THE MATERIAL WILL BE ASSESSED AGAINST THE OFFENDER AND COLLECTED FROM HIS /HER TRUST FUND. WHEN FUNDS ARE AVAILABLE USING THE "RETURN TO SENDER NOTIFICATION" FORM (ATTACHMENT A).

55. SHE NEVER SENT A FORM TO FORWARD MY OUTGOING MAIL CAUSING TO MISS ATLEAST A FEW DEADLINES. THIS IS HAPPENING WHILE I WAS TRYING TO FIGHT THE WRITE-UP FOR INCIDENT THAT OCCURRED 11-22-19. IT ALL SEEMS TOO COINCIDENTAL, CONSIDERING OTHER UNRELEVANCES I HAD FILED. I WAS INDIGENT AND DENIED THE TWO, ONE-ONCE PRIVILEGED OR NON-PRIVILEGED LETTERS PER WEEK.

56. DEFENDANT (AW) PEREZ (ALLEGEDLY) DENIED ME ACCESS TO DP-030501 ENTITLED "PERSONAL HYGIENE AND APPEARANCE."

### 57. CANTEN RESTRICTION

CODE. "AN INMATE MUST ALSO BE ALLOWED ACCESS TO WRITING SUPPLIES. THERE IS NOT A DOLLAR AMOUNT LIMIT, BUT A LIMIT TO THE ITEMS AN INMATE CAN PURCHASE."



58. C.) E.-M.

I HAVE BEEN DENIED OF CANTEEN FOR (7) MONTHS. ACCORDING TO THE POLICY I WAS BEING DENIED BASIC NEEDS OF ANY PERSON. BEING WE ARE RESTRICTED DOWN TO THE BASIC MINIMUM OF NECESSARIES. BESIDES, FOOD AND HUMAN NEEDS EVERYTHING ELSE IS A PRIVILEGE. TO BE DENIED THE BASIC MINIMUM AND CHARGED FOR INDULGENT SUPPLIES THAT SUPPOSED TO BE FREE TO INDULGENT INMATES.

59. II CANTEEN A.) B.) C.)...

I WAS NOT ALLOWED MY ALLOWABLES IN ACTION; ANY EXCEPTIONS TO PROCEDURE WILL REQUIRE WRITTEN APPROVAL FROM THE AGENCY DIRECTOR. THIS PROCEDURE IS EFFECTIVE AS INDICATED 06/22/17 SHOWN TO ME IN WRITINGS WHERE THE DIRECTOR CHANGED THE POLICY ON APRIL OR ANY TIME BEFORE THAT.

60. ACCORDING TO MILLER V. CITY OF MISSION, 705 F.2d 368 (9TH CIR. 1983) "LOCAL GOVERNING BODIES ARE LIABLE FOR CONSTITUTIONAL DEPRIVATIONS WHEN THE IMPROPER ACTIONS STEM FROM A DECISION OFFICIALLY ADOPTED AND PROMULGATED BY THE BODY'S OFFICERS." Id., AT 374, 375, QUOTING MONELL, 436 U.S. AT 690. ACCORDING TO THE FIFTH CIRCUIT, "IF ACTIONS OF CITY EMPLOYEES ARE TO BE USED TO PROVE A CUSTOM FOR WHICH THE MUNICIPALITY IS LIABLE, THOSE ACTIONS MUST HAVE OCCURRED FOR SO LONG OR SO FREQUENTLY THAT THE COURSE OF CONDUCT WARRANTS THE ATTRIBUTION TO THE GOVERNING BODY OF KNOWLEDGE THAT THE OBJECTIONABLE CONDUCT IS THE EXPECTED, ACCEPTED PRACTICE OF CONDUCT WARRANTS THE ATTRIBUTION TO THE GOVERNING BODY OF KNOWLEDGE THAT THE OBJECTIONABLE CONDUCT IS



THE EXPECTED, ACCEPTED PRACTICE OF CITY EMPLOYEES. "WEBSTER" V. CITY OF HOUSTON, 735 F.2d 838, 842 (5TH CIR. 1984) (EN BANC). THAT HOLDING WHICH WAS SEVERELY CRITICIZED BY A SUBSTANTIAL DISSENT, APPEARS TO BE AT ODDS WITH MUMFORD AND TUTTLE.

61. THE TENTH CIRCUIT, IN REFERENCE TO A SUPERVISOR, HAS STATED THAT A PLAINTIFF MUST SHOW THAT THE SUPERVISOR BREACHED SOME DUTY TO PLAINTIFF AND THAT WAS THE PROXIMATE CAUSE OF THE INJURY. MCCLELLAND V. FATEAU, 610 F.2d 693, 695 (10TH CIR. 1979). ~~MCCLELLAND~~ IN OTHER WORDS, THERE ~~MUST~~ BE A POLICE OR CUSTOM ~~AS~~ THERE MUST BE AN AFFIRMATIVE LINK BETWEEN THE MISCONDUCT COMPLAINED OF AND THE ACTION OF THE OFFICIAL. SEE ALSO PIZZO V. BROODE, 423 U.S. 362 (1976).

62. IN ORDER FOR A CITY TO BE LIABLE FOR THE ACTIONS OF AN EMPLOYEE, THERE MUST BE A POLICE OR CUSTOM WHICH CAUSED THE CONSTITUTIONAL DEPRIVATION. SEE SMITH V. CITY OF OKLAHOMA CITY, 696 F.2d 784 (10TH CIR. 1983). RESPONDENT SUPERIOR IS INSUFFICIENT. WHERE AN AGENCY'S EMPLOYEE TAKES ACTION ON HIS OWN, NOT PURSUANT TO A STATUTE, ORDINANCE, CUSTOM, ET CETERA, HIS ACTIVITIES FALL OUTSIDE OF THE SCOPE OF SECTION 1983.

### 63. 1/2 SUBSECTION

IN MCCLELLAND, THE TENTH CIRCUIT DEFINED THE SECTION 1983 TERM "SUBJECTS, OR CAUSE TO BE SUBJECTED..." THE COURT SAID THAT LANGUAGE IS BROADER THAN DIRECT PERSONAL



INVOLVEMENT. IT INCLUDES A FAILURE TO PERFORM A DUTY WHERE SUCH FAILURE IS THE CAUSE OF THE DEPRIVATION. *McClelland*, at 696; *Lusby v. T.O. & V. Stokes, Inc.*, 749 F.2d 1423, 1433 (10th Cir. 1984). Thus, the court held that there is "a cause of action under section 1983 when the defendant was in a position of responsibility, knew or should have known of the misconduct, and yet failed to act to prevent future harm... the standard to be applied is the conduct of a reasonable person, under the circumstances, in the context of the authority of each police chief and what he knew or should have known." *Id.*, at 697. See also *Hahn v. Mclellan*, 737 F.2d 771 (8th Cir. 1984). Thus, defendant must have been adequately put on notice of prior misbehavior.

#### 64. VI. STANDING

THE QUESTION THEN ARISES AS TO WHO IS A PROPER PLAINTIFF. IN *LOS ANGELES V. LYONS*, U.S. 95 (1983), THE COURT FOUND PLAINTIFF LACKED STANDING BECAUSE PLAINTIFF COULD NOT ESTABLISH A REAL OR IMMEDIATE THREAT OF HARM. ALTHOUGH THIS HOLDING HAS BEEN CRITICIZED AS MISUNDERSTANDING THE CONCEPT OF STANDING, IT CERTAINLY IS CORRECT INsofar AS IT STANDS FOR THE PROPOSITION THAT PLAINTIFF MUST DEMONSTRATE THAT HE IS IN A CLASS OF PEOPLE WHO EITHER HAS BEEN HARMED OR IS ABOUT TO BE HARMED OR IS ABOUT TO BE HARMED. OF COURSE, *LYONS* DOES NOT RESTRICT THE RIGHT OF A CITIZEN TO CHALLENGE THE CONSTITUTIONALITY OF A PARTICULAR RULING. A PLAINTIFF, FOR EXAMPLE, MAY ATTEMPT TO BRING ACTION WHICH CHALLENGES CONSTITUTIONALITY OF



AN ORDINANCE AND SEEK MONEY DAMAGES AS A RESULT OF THE UNCONSTITUTIONAL PROVISIONS. ALTHOUGH PLAINTIFF MAY HAVE STANDING TO CHALLENGE THE ORDINANCE, HE WILL BE ENTITLED TO NO MONETARY RELIEF UNLESS HE CAN DEMONSTRATE PERSONAL HARM. *CF. CAREY V. PIPHUS*, 435 U.S. 247 (1978).

65. DEFENDANT'S HARMED PLAINTIFF AS READ IN AMENDED COMPLAINT. SEE PHOTO OF INJURIES, AFFIDAVITS, REQUEST TO STATE, AND APPEAL FORMS TO ARA WHERE PLAINTIFF TRIED TO "EXHAUST REMEDIES."

66. A DEPRIVATION OF A BASIC HUMAN NEED (SUCH AS FOOD, CLOTHING, SHELTER, EXERCISE, MEDICAL CARE OR REASONABLE SAFETY) (THE OBJECTIVE ELEMENT). *HELLING V. MCINNIS*, 509 U.S. 25, 31-32 (1993).

67. THE EIGHTH AMENDMENT PROTECTS AGAINST CONDITIONS THAT POSE AN UNREASONABLE RISK OF FUTURE HARM, AS WELL AS THOSE THAT ARE CURRENTLY CAUSING HARM *HELLING* 509 U.S. at 33.

68. THE ADMINISTRATION KNEW OF ALL GRIEVANCES RELATED TO INCIDENT 7-25-19 AND 11-22-19 BEFORE 2-13-19 I FELT I WAS RETALIATED AGAINST TO DISCOURAGE ME FROM FILING GRIEVANCES.

69. IT IS NOT ENOUGH TO ALLEGE THAT THE "TOTALITY OF CONDITIONS" IS UNCONSTITUTIONAL; PLAINTIFF MUST ALLEGE DEPRIVATION OF ONE OR MORE IDENTIFIABLE HUMAN NEEDS. *WILSON V. SUTTER*, 501 U.S. 294,



304-05 (1991). PLEASE SEE AMENDED COMPLAINT OF A THINGS MENTIONED WITHIN.

70. ESTELLE V. GAMBLE 429 U.S. 97, 104 (1976); MURPHY V. WALKER, 51 F. 3d 714, 719 (7th CIR. 1995) (TWO-MONTH DELAY IN GETTING PRISONER WITH HEAD INJURY TO A DOCTOR); LEMARCHE V. WISNESKI, 266 F.3d 429 (6th CIR. 2001). cert. denied 535 U.S. 1056 (2002) INDIFFERENCE; HUGHES V. JOILET CORR. CENTER, 931 F.2d 425, 428 (7th CIR. 1991) (EVIDENCE THAT MEDICAL STAFF TREATED THE PLAINTIFF "NOT AS A PATIENT, BUT A NUISANCE").

71. SEE GATES V. COOK, 376 F.3d 323, 332 (5TH CIR. 2004) ("MENTAL HEALTH NEEDS ARE NO LESS SERIOUS THAN PHYSICAL NEEDS") TORRACO V. MALONEY, 923 F.2d 231, 234 (1ST CIR. 1991) (DELIBERATE INDIFFERENCE TO AN INMATE'S SERIOUS MEDICAL HEALTH NEEDS VIOLATE THE EIGHTH AMENDMENT")

72. A "SEVERE" MENTAL ILLNESS IS ONE "THAT HAS CAUSED SIGNIFICANT DISRUPTIONS IN AN INMATE'S EVERYDAY LIFE AND WHICH PREVENTS HIS FUNCTIONING IN THE GENERAL POPULATION WITHOUT DISTURBING OR ENDANGERING OTHERS OR HIMSELF. TILLEY V. OWENS, 719 F. SUPP. 1256, 1286 (W.D. Pa. 1989), aff'd, 907 F.2d 418 (3d CIR. 1990)

73. LILISSON V. SANGAMON COUNTY SHERIFFS DEPT, 408 F. SUPP 2d 609, 621-22 C.C.D 111. 2006) (PLAINTIFF WAS STRAPPED INTO A WHEELCHAIR FOR SEVERAL HOURS, FORCED TO URINATE ON HIMSELF, AND LEFT SITTING IN HIS URINE FOR SEVERAL HOURS WHILE



IN A MANIC STATE). SEE GRIEVANCES WHERE I COMPLAINED OF OFFICERS STRIPPING OFF MY CLOTHES IN A HUMILIATING MANNER, FORCED ME TO EAT WITH THE SAME HANDS I JUST CLEANED MYSELF WITH ETC.

74. NEGLIGENCE IS "THE FAILURE TO EXERCISE THE STANDARD OF CARE A REASONABLE PRUDENT PERSON WOULD HAVE EXERCISED IN A SIMILAR SITUATION; ANY CONDUCT THAT FALLS BELOW THE LEGAL STANDARD ESTABLISHED TO PROTECT OTHERS AGAINST UNREASONABLE RISK OF HARM, EXCEPT FOR CONDUCT THAT FALLS BELOW THE LEGAL STANDARD.

75. TORTURE AND CRUEL, INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT, THE INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS; AND THE INTERNATIONAL COVENANT ON ELIMINATION OF ALL FORMS OF RACIAL DISCRIMINATION.

76. 1ST AMENDMENT ① THEY HAVE NO SECURITY REASON NOT TO ALLOW ME TO GRIEVE ② I HAVE NO OTHER WAY OF GRIEVING MY ISSUES AND GOING TO COURT ③ DISCOURAGES OTHER INMATES ABOUT THE GRIEVANCE SYSTEM ALL TOGETHER ④ THERE IS NO OTHER WAY OF GRIEVING MY ISSUES AND GOING TO COURT. COURTS DON'T HONOR UNEXHAUSTED CLAIMS. TURNER TEST.

77. ① AFRICAN-AMERICAN MALE WHO AM BEING TREATED DIFFERENTLY FROM OTHER INMATES NON-AFRICAN AMERICAN. WE ARE THE EXAMPLE OF DEPRIVATION FOR 100 YEARS OF YEARS IN SLAVERY FOR AMERICA AND HAVE BEEN THE SOLE BASIS OF TORTURE (RACE) IN AMERICA



SINCE, "I COULD REMEMBER," THREW LITIGANCES WE HAVE BEEN HISTORICALLY TREATED UNFAIRLY. DUE TO THE FACT OF "BLACK HISTORY MONTH." THE MONTH I WAS BRUTALLY BEATEN BY CORRECTIONAL OFFICERS WITH NO ONE ON MY SIDE BUT "LUD"! I WOULDN'T BE SURPRISED, EQUAL PROTECTIONS AREN'T GRANTED.

78. I WAS MARED AND TAKEN TO JAIL FOR STATES OWN PERSONAL REASONS. "WHICH" I BELIEVE WAS TO STOP "PROTECTED ACTION" FILING A LAWSUIT AGAINST WARDEN. TAKEN "ADVERSE ACTION" BY PLACING ME IN SECL. WHERE THEY KNOW I CAN'T HAVE PHYSICAL ASSISTANCE FOR LAW LIBRARY INMATE/ASSISTANT.

79. I WAS IN THE PROCESS OF LITIGATING MY ISSUES ON 7-28-19 - 8-1-19 ASKING FOR COMPENSATION (1)

80. 9-2-19 I WAS MARED AND BEAT-UP WITH MINOR INJURIES (2)

81. THEY HAD JUST TAUGHT ME OF THE LITIGANCE PROCESS. SO, I FILED ALL OLD LITIGANCES JUST TO EXHAUST MY REMEDIES THEN 11-22-19. I WET MARED WITHOUT REASON I NEVER REFUSED TO CURF-UP BUT STATED I WAS GOING TO PACK MY PROPERTY. DUE PROCESS "POLICY AND PROCEDURE" 2-13-20 I WAS BRUTALLY BEATEN AND DENIED DUE PROCESS OR REASON. (3)

81. "DELIBERATE INDIFFERENCE" (1) THE PRISON OFFICIALS KNEW OF THE LAWSUIT I WAS TRYING TO DO AND TREATED ME DIFFERENT THAN OTHER INMATES, BY MAREING ME, BEATING ME, UNTIL I WAS UNCONSCIOUS AND ~~ACTING DIFFERENT WAY~~.



UNRECOGNIZABLE, STRIPPING ME NAKED IN FRONT OF SEVERAL STAFFS MALE AND FEMALE IN A HUMILIATING MANNER WITHOUT ME KNOWING THEIR SEXUAL PREFERENCE (LGBTQ)? I AM A HETEROSEXUAL MALE IN THE OPPOSITE SEX. NO REASON WAS GIVEN FOR TAKING MY CLOTHES OFF I CLAIM, HARASSMENT.

92. THE WOMEN GUARDAS HAVE TO BE PRESENT WHEN A FEMALE IS BEING STRIPPED. I DID NOT KNOW IF THEY IDENTIFY AS "LGBTQ I AM A HETEROSEXUAL MALE "STRAIGHT:" AFTER "I SAID NO!" WHY REMOVE CLOTHES AFTER PAT SEARCH. WHAT LAW SAYS ITS OKAY TO FORCE SOMEONE TO GIVE THEIR BLOOD. DENYING ME BASIC HYGIENE; MAIL, SOAP, SHOWER, SHOWER SHOES, BEDDING AND ACCESS TO LIGHT BEING CUT-OFF. PRISONERS HAVE A FUNDAMENTAL RIGHT TO ACCESS AND USE TO COURT SYSTEM. I WAS HELD IN JEFFERSON FOR (6) EIGHT MONTHS AFTER ASSAULT & BATTERY, DENYING ME MY DUE PROCESS RIGHT BY FALSIFYING MY RECORD, RETALIATION, BRUTALLY BEATEN ME, AND DENYING ME MEDICAL TREATMENT.

93. 14TH AMENDMENT (1) THE GRIEVANCE RESTRICTION IS MORE ~~RE~~ INCORPORATED TOWARD AFRICAN-AMERICANS (2) THEY INTENDED TO STOP ME FROM BEING VOCAL AND LETTING OTHERS KNOW ABOUT "PRISON CONDITIONS."

94. ASSAULT & BATTERY (1) THE NEED OF FORCE USED WAS UNNECESSARY / DUE TO HAND RESTRAINTS, KEVLAR TACTICAL GEAR (2) WHAT CAN A 165 LBS MALE DO TO HARM (6) SIX FULL GROWN MEN WHILE CUFFED BEHIND MY BACK AND LAYING ON THE GROUND (3) I NEVER DENIED HAND RESTRAINTS AND DID CUFF



UP ④ CONSIDERING THE FIRST THREE NO EXTRACTION WAS NECESSARY ⑤ I WAS BLEEDING FROM MY EYE, BOTH EYES WERE SWOLLEN AND BLACK, I RECEIVED (2) HOLES IN/OUTSIDE OF MY MOUTH BLEEDING, MY HEAD WAS REPEATEDLY BANGED ON THE CONCRETE CAUSING TEMPORARILY UNCONSCIOUSNESS. (I BELIEVE A BONE IN MY FACE WAS FRACTURED). I HAVE HEADACHES AND MUSCLE SPASMS IN MY LEFT CHEEK. STILL DID NOT GET X-RAY I ASKED FOR.

85. 5TH AND 14TH AMENDMENT: ① MORE PROCEDURES ② I HAVE RECEIVED MORE WRITE-UPS IN 6 MONTHS THAN I HAVE ANY JUSTICE REGARDING MY TREATMENT AS A HUMAN BEING.

86. I REFUSED A U/A AT HOLDENVILLE GENERAL HOSPITAL NOTING A \$1500.00 EXTORTION FEE I WILL BE CHARGED. MARCH 21, 2019 I WAS FOUND GUILTY OF A FAILED U/A AND CHARGED \$65.00 WHICH IS NOT A PART OF DOC PROCEDURE USED TO INTIMIDATE ME AND PUNISH ME.

87. 6TH AMENDMENT: DENIAL TO LAW LIBRARY ACCESS HAS INSURED MY NON-FRIVOLOUS CLAIMS TO COURT HAVING PLACED EXTRA-RESTRICTIVE CONDITIONS I MUST HAVE MEANINGFUL ACCESS TO THE COURTS IN SOMEWAY.

88. 8TH AMENDMENT: MEDICAL MALPRACTICE AND ASSAULT & BATTERY. (3) I WAS BLEEDING OUT OF MY FACE AND SWOLLEN AFTER HAVING MY FACE RAN INTO CONCRETE AND LOSING CONSCIOUSNESS (6) SHE KNEW SHE COULD'VE DID MORE AND DID.



INT (2) I HAD OBVIOUS ABRASIONS OR SOME SORT OF FUNGUS (6) SHE DENIED ME TREATMENT AND IT SPREADED MAYBE CAUSING RINDWORMS / FUNGUS / PARASITE / JOCK ITCH (2) THEY BEAT ME FOR THEIR OWN PERSONAL REASONS (6) I WAS CUFFED AND DOUBLE WRAPPED.

89. RETALIATION: (1) I HAVE A RIGHT TO BELIEVE ABOUT "PRISON CONDITIONS" (2) THEY LOST MY TV, SPRAYED ME WITH (OC), BEAT ME, STOPPED IN/OUTGOING MAIL, LOUENANCE RESTRICTION ~~DENIED~~ ME MEDICAL TREATMENT, SEXUALLY EXPLOITED / HARASSED ME, TAMPERED WITH MY FOOD (ALLEGEDLY), FALSIFY ACCUSED ME, TORTURED ME WITH LIGHT CONSTANTLY LITE IN CELL FOR (5) DAYS WHILE (NAKED), ANTACONIZED ME, TREATED ME UNFAIRLY DUE TO MY RACE, AND DENIED ME DUE PROCESS. (3) FROM THE WARDEN DOWN TO CIO I HAVE HAD UNBELIEVABLE ISSUES AND HAVE BEEN BLOCKED BY ADMINISTRATION. THERE IS NO WAY THEY COULDN'T HAVE KNOWN I HAD FILED 20-30 NON-FRIVOLOUS (ALLEGEDLY) GRIEVANCES.

90. (1) NO REASON TO KEEP FROM ME. IT WAS NOTHING THAT COULD HARM ANYONE (2) MY MAIL IS LIMITED ENOUGH FROM THE WORLD INKED LESS EXPOSURE TO SOMEONE LOSING IT OR THROWING IT AWAY (3) MAKES THE GUARDS FEEL AS IF THEY CAN USE IT AS A PUNISHMENT AGAINST ME (4) JUST FOLLOW THE LAW / POLICY AND PROCEDURE ESTABLISHED ~~THEY~~ HAD NO REASON TO RESTRICT MY MAIL WITHOUT DUE PROCESS ACCORDING TO ODOC PROCEDURES. 1ST AMENDMENT VIOLATION



91. HUDSON V. McMillian, 503 U.S. 1, 4, 112 S.Ct. 995, 117 L. Ed. 2d 156 (1992), THIS COURT UPHELD THAT [\*\*LED HR1] [1] "THE USE OF EXCESSIVE PHYSICAL FORCE AGAINST A PRISONER MAY CONSTITUTE ~~CRUEL~~ AND UNUSUAL PUNISHMENT [EVEN] WHEN THE INMATE DOES NOT SUFFER SERIOUS INJURY.

92. PORTER V. NUSSLE, 534 U.S. 576 (2002), THE SUPREME COURT HELD THAT "PRISON CONDITIONS" REFERS TO EVERYTHING THAT HAPPENS IN PRISON INCLUDING SINGLE INCIDENTS OF GROSS BRUTALITY OR INADEQUATE MEDICAL CARE. SEE BOOTH V. CHURNER, 532 U.S. 731 (2001), U.S. 731 (200), YOU HAVE TO USE THE PRISON'S GRIEVANCE ~~PROCEDURE~~ SYSTEM EVEN IF IT DOES NOT OFFER THE TYPE OF RELIEF YOU WOULD LIKE TO SUE FOR.

93. IN THE U.S. SUPREME COURT CASE, JONES V. BOCK, 549 U.S. 199 (2007), THE COURT STATED THAT PRISONERS DO NOT NEED TO SHOW IN THEIR COMPLAINT THAT THEY EXHAUSTED ALL GRIEVANCE PROCEDURES. IN MY CASE I OVER EXHAUSTED MY CLAIM THRU GRIEVANCE PROCEDURE AND ITS STILL NOT ENOUGH HOW CAN IT BE BOTH? IF I DID IT TO BE SURE IT WAS DONE RIGHT, HOW CAN I, THEN, BE HELD LIABLE FOR TRYING TO DO WHAT THE PROCEDURES?

94. MONTELL V. DEPT. OF SOCIAL SERVICES OF THE CITY OF NEW YORK, 436 U.S. 659 (1978), YOU CAN SUE A CITY, OR ANY OTHER MUNICIPALITY, FOR AN INJUNCTION OR DAMAGES WHERE THE VIOLATION OF YOUR RIGHTS WAS THE PRODUCT OF A CITY'S OFFICIAL POLICY OR UNOFFICIAL CUSTOM PER BOUR V. CINCINNATI, 475



## CONCLUSION

MY CASES STANDING IS DIFFERENT BECAUSE THE CIRCUMSTANCES ARE ALL RELATED TO MY CASE SOME RELATED OTHERS DIFFERENTIATE. I DO NOT KNOW THE LAW BUT CAN READ AND WRITE. ~~THE~~ INMATE WITH THE BARE MINIMUM OF LEGAL UNDERSTAND HAVE PREPARED THESE PAGES. I PRAY, THAT THIS CASE SET NEW PRECEDENTS AND JUDGE FAIR AS A CITIZEN WITH CIVIL RIGHTS COMPLAINTS WITH NO EDUCATION OF THE LAW.



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BRANDON LEE BROWN  
Name (print)

592090  
DOC Number

A-3-17  
Unit and Cell Number

MARCH 31, 2021  
Date

*Brandon Lee Brown*  
Signature

I NEED HELP DRAFTING A OPPOSITION TO THE EASTERN DISTRICT COURT  
OF OKLAHOMA

— already on the list.

( NO HELP! DONE INDEPENDANTLY )

3 fgl  
Staff Signature

4-1-21  
Date Returned to Inmate

DOC 030115C (R 1/17)